

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

SAMUEL A. CAMPBELL, et al., : CASE NO. 1:08-CV-00737
Plaintiff, : JUDGE SUSAN J. DLOTT
-vs- :
THE CITY OF SPRINGBORO, OHIO, : AFFIDAVIT OF
et al., : DOUGLAS D. BRANNON
Defendants. :

STATE OF OHIO)
) SS:
COUNTY OF MONTGOMERY)

Now comes Douglas D. Brannon, an adult over eighteen years of age, and after being duly cautioned and sworn, deposes and states the following:

1. I am an attorney licensed to practice in the State of Ohio and before this Court.
2. I have been retained to represent the Plaintiffs in the case at bar.
3. As part of my representation of the Plaintiffs in the case at bar, on or about June 9, 2009, I forwarded a Request for Documents to the Defendants' Counsel, Wilson G. Weisenfelder, Jr., Esq.
4. For reference the documents attached hereto have been marked to correspond to the entity or individual as follows: S=Springboro Police Department, G= Chelsie Gemperline, C= Samuel Campbell.
5. I hereby certify that the following documents attached to this affidavit represent a portion of those documents provided to me by Mr. Weisenfelder in response to the above referenced Request for Documents:

Exhibit S1: Springboro Canine Policy Effective December 10, 2008.
Exhibit S2: Springboro Use of Force Policy.
Exhibit S3: Training Certificates of Nick Clark and Spike.
Exhibit S5: Canine Unit Training Logs A-C.
Exhibit S9: Springboro Sun Newspaper Article printed October 16, 2008.

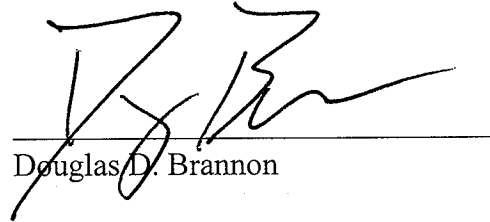


- Exhibit S14: Supervisors Use of Force Investigation for Sam Campbell, October 21, 2007.
- Exhibit S15: Memorandum from Nick Clark to Lt. Wheeler regarding Shane Menz bite dated August 22, 2006.
- Exhibit S17: Canine Legal Update IACP Canine Policy from Terry Fleck website.
- Exhibit S18: K9 Usage Summary from Nick Clark to Chief Kruithoff dated January 1, 2006.
- Exhibit S19: K9 Usage Summary from Nick Clark to Chief Kruithoff dated January 31, 2007.
- Exhibit S20: K9 Usage Summary from Nick Clark to Chief Kruithoff dated January 22, 2008.
- Exhibit G2: K9 Deployment Report for Gemperline dated October 11, 2008
- Exhibit G19: Memorandum from Lt. Tim Parker regarding Chelsie Gemperline
- Exhibit G20: Springboro Dispatch Records from October 11, 2008 regarding Chelsie Gemperline.
- Exhibit G21: Narrative Supplement from Deputy Jamie Apking regarding Chelsie Gemperline.
- Exhibit G22: Follow-up Interview with Nick Clark on January 7, 2009 regarding Chelsie Gemperline and choke-off maneuver.
- Exhibit G23: Narrative Statement of SPD Sgt. Zimmaro on December 21, 2008 regarding Chelsie Gemperline.
- Exhibit G25: Memorandum from Sgt. Brian Dulle on October 16, 2008 regarding Chelsie Gemperline.
- Exhibit G33: Memorandum from Lt. Wheeler to Chief Kruithoff on December 12, 2008 regarding Chelsie Gemperline.
- Exhibit G34: Memorandum from Interview of Nick Clark by Lt. Wheeler on December 9, 2008.
- Exhibit G35: Memorandum from Interview of Sgt. Brian Dulle by Lt. Wheeler on December 19, 2008.
- Exhibit G36: Memorandum from Interview of Matt Hayes by Lt. Wheeler on January 3, 2008.
- Exhibit G38: Pictures of Chelsie Gemperline and Playhouse
- Exhibit G40: SPD Preliminary Use of Force Investigation dated October 11, 2008
- Exhibit G41: Memorandum from Sgt. Brian Dulle dated October 16, 2008 regarding Chelsie Gemperline.
- Exhibit C1: Incident Report and Narrative dated October 21, 2007 regarding Samuel Campbell.
- Exhibit C2: Springboro Dispatch Records October 21, 2007 regarding Samuel Campbell.

- Exhibit C3: K9 Deployment Report dated October 21, 2007 regarding Samuel Campbell.
- Exhibit C27: Supervisors Use of Force Investigation dated October 21, 2007 regarding Samuel Campbell.
- Exhibit C28: Email from Sgt. Dan Bentley to Lt. Tim Parker dated October 29, 2007.

6. I hereby certify that the above documents attached to this affidavit are true and accurate reproductions of the documents provided to me by Defense counsel.

Further Affiant sayeth naught.


Douglas D. Brannon

Sworn before me and subscribed in my presence this 20th day of December, 2010.


Notary Public



ALANA Y. BOYD
Notary Public, State of Ohio
My Commission Expires 09-23-11